

15 December, 1999

Lori Gravel  
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Dear Ms. Gravel,

I am writing to offer comments on the NMFS Supplemental Environmental Impact Statement on fisheries conservation and management in the Bering Sea and Gulf of Alaska.

The SEIS should address the following questions:

1. How do the current groundfish fisheries affect the marine ecosystem including but not limited to essential habitat for **all** species throughout their range, pollution caused by fossil fuel emissions (do more boats have a larger impact than a smaller number of vessels), impacts of discards in high discard areas, long-term impacts on species composition, and impacts on the various trophic levels? What are the environmental effects of bycatch, including both economically valued species (such as salmon, crab, herring and halibut) and other marine life (such as corals, sponges, juvenile fish)?
2. Evaluate how current and alternative management strategies for the existing fisheries may affect the environment. Have current management strategies been successful for all species? For which fisheries would marine refugia work as a management tool? Are there clear goals and guidelines for bycatch management and are the goals being met?
3. Discuss current limitations regarding the “best scientific information available” and what kinds of approaches can make the information better. Observer data is a prime example of where improvements could be made easily. The current observer program has a procurement system wrought with conflict of interest and lack of accountability to NMFS. Data quality has suffered due to high turnover rates of observers, lack of support by NMFS, NMFS’ inability to place staff and/or observers on vessels based on a sound statistical design. Some of the most damaging fisheries have an *effective* sample rate of <20%. In fact, in the Bering Sea/Aleutian Islands area between 1993-1997, effective sample rate for a relatively “undamaging” fishery, the groundfish longline fishery, averaged 27% while the GOA averaged 10%. Observers are biologists and should be collecting information on ALL catch to the species level (when possible) not just collecting information on commercially important species. **Data quality could improve by increasing effective sample rates and increasing the amount of detail observers collect.**

4. Current observer procurement system is not flexible and places a larger economic burden on small vessels. NMFS has the authority to implement a fee system to fund data collection essential to management. Fees should be based on total catch (not on total fish retained). How has the current system biased management data and to what extent?

Thank you for your attention to these comments.

Sincerely,

Kimberly S. Dietrich  
Executive Officer